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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**ADMINISTRATIVE MOTION TO SEAL
 PORTIONS OF PLAINTIFFS' MOTION
 TO FILE SURREPLY IN OPPOSITION
 TO GOOGLE'S MOTION TO DISMISS
 THIRD AMENDED COMPLAINT**

The Honorable Richard Seeborg
 Courtroom 3 – 17th Floor
 Date: October 28, 2021
 Time: 1:30 p.m.

Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiffs respectfully seek to seal certain portions of Plaintiffs' Motion for Leave to File Surreply in Opposition to Google's Motion to Dismiss the Third Amended Complaint (the "Motion"), which refer to material designated by Google as "Confidential" or "Highly Confidential – Attorneys' Eyes Only." The Motion and its supporting papers are attached hereto as Exhibit A.

The Motion references and attaches meet-and-confer correspondence between counsel for the parties. Plaintiffs seek to seal this information because Google LLC ("Google") has taken the position that all such correspondence are "Confidential" under the Protective Order.

This motion to seal pertains to the following information.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Plaintiffs' Motion for Leave to File Surreply in Opposition to Google's Motion to Dismiss Third Amended Complaint	Google	Portions highlighted in Blue on Page 1.	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Plaintiffs' [Proposed] Surreply in Opposition to Google's Motion to Dismiss Third Amended Complaint	Google	Portions highlighted in Blue on Pages 3-4.	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Declaration of Mark C. Mao In Support of Plaintiffs' Motion to File Surreply ("Mao Decl.")	Google	Portions highlighted in Blue on Pages 1-2.	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Ex. AA to Mao Decl.	Google	Entirety	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Ex. BB to Mao Decl.	Google	Entirety	Material designated "Confidential" or

			“Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order
Ex. CC to Mao Decl.	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order

Exhibits BB and CC to the Mao Decl. have been separately redacted for privilege, at the request of Google’s counsel.

Pursuant to Civil Local Rule 79-5(e), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: October 18, 2021

Respectfully submitted,

By: /s/ Amanda Bonn

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